

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**
 8 U.S.C. §1324(a)(1)(A)(v)(I) and (B)(i) -  
 Conspiracy to Harbor an Illegal Alien;  
 18 U.S.C. § 982(a)(6) - Forfeiture

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony
**PENALTY:**
 10 years imprisonment, \$250,000 fine; up to 3 years supervised  
 release; \$100 special assessment and forfeiture.

 Name of District Court, and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA
**FILED**

DEFENDANT - U.S.

JUN - 3 2009

FANG PING DING

 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND

DISTRICT COURT NUMBER

CR09-00573 SBA

**E-filing****PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

FEDERAL BUREAU OF INVESTIGATION

☐ person is awaiting trial in another Federal or State  
 Court, give name of court

☐ this person/proceeding is transferred from another  
 district per (circle one) FRCrP 20, 21 or 40. Show  
 District

☐ this is a reprosecution of  
 charges previously dismissed  
 which were dismissed on  
 motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a  
 pending case involving this same  
 defendant

☒ prior proceedings or appearance(s)  
 before U.S. Magistrate regarding  
 this defendant were recorded under
SHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

4:09-70487 WDB

 Name and Office of Person  
 Furnishing Information on  
 THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y  
 (if assigned)

ANDREW S. HUANG, AUSA

**DEFENDANT****IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons  
 was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges
- } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer  
 been filed?

☐ Yes  
☐ No

 If "Yes"  
 give date  
 filed

**DATE OF  
 ARREST**

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
 TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☐ NO PROCESS\*
☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 \*Where defendant previously apprehended on complaint, no new summons  
 or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

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 NORTHERN DISTRICT OF CALIFORNIA

 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND

DEFENDANT - U.S.

WEI WEI LIANG (aka XIAN HUI LIANG; WEI WEI SHEN)

DISTRICT COURT NUMBER

CR09-00573 SBA

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 Name of Asst. U.S. Att'y  
 (if assigned)

ANDREW S. HUANG, AUSA

 Name of District Court, and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

BO SHEN

DISTRICT COURT NUMBER

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 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND
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Date/Time:

Before Judge:

Comments:

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

E-filing

**CR09-00573 SBA**

UNITED STATES OF AMERICA,

v.

FANG PING DING,  
WEI WEI LIANG (a/k/a Xian Hui Liang and  
Wei Wei Shen), and  
BO SHEN,

**FILED**

JUN - 3 2009

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

DEFENDANT(S).

## INDICTMENT

8 U.S.C. § 1324(a)(1)(A)(iii), (v)(I), and (B)(i) – Conspiracy to Harbor  
an Illegal Alien; 18 U.S.C. § 982(a)(6) – Forfeiture

A true bill.



Foreman

Filed in open court this 3<sup>RD</sup> day of

JUNE 2009

Clerk

Bail, \$

*No bail warrant only for Bo Shen.*  
*Wayne De Brazil 6-3-09*

JOSEPH P. RUSSONIELLO (CABN 44332)  
United States Attorney

**FILED**

**JUN - 3 2009**

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

**E-filing**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
FANG PING DING,  
WEI WEI LIANG (a/k/a Xian Hui Liang and  
Wei Wei Shen), and  
BO SHEN,  
Defendants.

**CR09-00573**

**SBA**

VIOLATIONS:

8 U.S.C. § 1324(a)(1)(A)(iii), (v)(I), and  
(B)(i) – Conspiracy to Harbor an Illegal  
Alien; 18 U.S.C. § 982(a)(6) – Forfeiture

OAKLAND VENUE

**INDICTMENT**

The Grand Jury charges:

**INTRODUCTORY ALLEGATIONS**

At all times pertinent to this Indictment:

1. The defendants, FANG PING DING, WEI WEI LIANG (a/k/a Xian Hui Liang and Wei Wei Shen), and BO SHEN, were all originally nationals of the People's Republic of China before immigrating to the United States. Defendants LIANG and SHEN naturalized as United States citizens before the conspiracy period and defendant DING naturalized during the conspiracy period.

INDICTMENT

2. Defendant DING is defendant LIANG's mother and defendant SHEN's mother-in-law. Defendants LIANG and SHEN are each other's wife and husband, respectively.

3. The victim, an individual with initials G XK, whose identity is known to the grand jury, was a citizen of the People's Republic of China, who was admitted into the United States on April 7, 2008 on a B1/B2 visitor's visa and whose period of admission expired on October 6, 2008. G XK had no prior relationship with any of the defendants prior to the conspiracy period.

COUNT ONE: (8 U.S.C. §§ 1324(a)(1)(A)(iii), (v)(I), and (B)(i) – Conspiracy to Harbor an Illegal Alien)

4. Paragraphs 1 through 3, above, are hereby incorporated by reference.

5. Beginning some time unknown to the Grand Jury, but at least by in or about December 2007, and continuing until on or about April 18, 2009, in the Northern District of California and elsewhere, the defendants,

FANG PING DING,

WEI WEI LIANG (a/k/a Xian Hui Liang and Wei Wei Shen), and

BO SHEN,

did knowingly conspire with each other and other persons, to commit an offense against the United States, specifically, to conceal, harbor, and shield from detection, and attempt to conceal, harbor, and shield from detection, an alien, namely, victim G XK, in any place, including any building and any means of transportation, knowing and in reckless disregard of the fact that victim G XK, had come to, entered, and remained in the United States in violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

MANNER AND MEANS OF THE CONSPIRACY

6. It was part of the conspiracy that defendants DING, LIANG, and SHEN recruited victim G XK in the People's Republic of China and assisted her to come to Fremont, California in Northern District of California to work for the defendants as their live-in domestic servant.

7. It was further part of the conspiracy that defendants DING, LIANG, and SHEN, knowing that victim G XK had obtained a B1/B2 visitor's visa and entered the United States

1 under false pretenses, housed GXK in their home in Fremont, California and obtain her labor and  
 2 services as their live-in domestic servant.

3 8. It was further part of the conspiracy that defendants DING, LIANG, and SHEN,  
 4 knowing that victim GXK's authorized period of admission to the United States expired on or  
 5 about October 6, 2008, continued to house her in Fremont, California and obtain her labor and  
 6 services as their live-in domestic servant.

### 7 OVERT ACTS

8 9. As part of the conspiracy, to further the objects thereof, one or more of the  
 9 defendants (DING, LIANG, and SHEN), did the following:

- 10 a. Met with victim GXK in the People's Republic of China in or about  
 11 December 2007 to persuade her to come to the United States to work for  
 12 defendants DING, LIANG, and SHEN, as a domestic servant.
- 13 b. Between in or about December 2007 and March 2008, directed, assisted  
 14 and advised victim GXK on procuring a B1/B2 visitor's visa for entry into  
 15 the United States.
- 16 c. Through a written agreement dated on or about March 11, 2008,  
 17 contracted with victim GXK for GXK to go to the defendants' house and  
 18 engage in household domestic work.
- 19 d. Traveled via commercial airplane with victim GXK to the United States  
 20 from the People's Republic of China, arriving at San Francisco  
 21 International Airport on or about April 7, 2008.
- 22 e. Transported victim GXK from San Francisco International Airport to the  
 23 defendants' home in Fremont, California on or about April 7, 2008.
- 24 f. Housed victim GXK at the defendants' home in Fremont, California, from  
 25 in or about April 7, 2008 to in or about April 18, 2009.
- 26 g. On numerous instances, including in or about April 2008, instructed  
 27 victim GXK not to leave the premises of their home in Fremont,  
 28 California, for the stated reason of avoiding detection by police.



h. In or about July 2008, advised victim GXK that her visa had expired, that she should not leave the premises because she was now illegally in the United States and the police would arrest her.

i. On or about April 18, 2009, failing to truthfully answer the Fremont Police Department's inquiry as to how the defendants knew victim GXK.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), (v)(I) and (B)(i).

FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(6) – Criminal Forfeiture)

Upon conviction of the offense alleged in this Indictment, the defendants,

FANG PING DING,

WEI WEI LIANG (a/k/a Xian Hui Liang and Wei Wei Shen), and

BO SHEN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6), any property, real and personal, that (1) constitutes, and is derived from and is traceable to the proceeds obtained directly and indirectly from the commission of the offense of which the person is convicted; and (2) was used to facilitate, and was intended to be used to facilitate, the commission of the offense of which the person is convicted, including but not limited to the following:

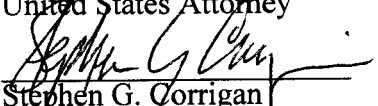
a. Alameda County parcel number 519-1654-76, tracer number 37348200, located in Fremont, California.


DATED: 6-3-09

A TRUE BILL.

  
FOREPERSON

JOSEPH P. RUSSONIELLO  
United States Attorney

  
Stephen G. Corrigan  
Acting Chief, Oakland Branch

(Approved as to form: )

AUSA HUANG

INDICTMENT